

Exhibit 12

Brian Stevens
November 13, 2020

58 to 61

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1	-- BRIAN STEVENS --	1	-- BRIAN STEVENS --
2	Q. And so with respect to that direct	2	A. No, not particular, no.
3	experience within financial services organization,	3	Q. Did you have any -- while you were at
4	is there anyone who had more of that experience in	4	Google, did you have any conversations with anyone
5	Google Cloud than Ms. Rowe?	5	regarding Ms. Rowe's performance?
6	MR. GAGE: Objection.	6	A. No, not that I recall.
7	A. In Cloud perhaps, but not that I'm	7	MR. GAGE: Objection.
8	aware of.	8	Q. While you were at the company, did
9	Q. Did you ever have any conversations	9	you have any conversations with anyone regarding
10	with Mr. Grannis regarding Ms. Rowe's role	10	Ms. Rowe's compensation?
11	specifically?	11	A. Not that I recall.
12	MR. GAGE: Objection.	12	MR. GAGE: Objection.
13	A. Not that I recall specifically.	13	Q. Okay. Did you play any role in
14	Q. Did you ever have any discussions	14	setting Ms. Rowe's compensation at the time of her
15	with Mr. Grannis regarding Ms. Rowe's trajectory	15	hire?
16	at the company?	16	A. Typically I wouldn't have.
17	MR. GAGE: Objection.	17	Q. Typically you wouldn't have what?
18	A. No, not that I recall.	18	A. Played a role in her compensation
19	Q. Did you have any conversations with	19	unless an exception needed to be made.
20	Mr. Grannis regarding Ms. Rowe's performance?	20	Q. Do you recall any of the technical
21	A. Not that I recall.	21	directors for whom you played a role in setting
22	Q. Did you have any conversations with	22	their initial compensation?
23	Mr. Grannis regarding Ms. Rowe's compensation?	23	A. No, I don't recall being involved in
24	A. Not that I recall.	24	the compensation.
25	Q. Did you have any conversations with	25	Q. Did you play any role in setting what
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1	-- BRIAN STEVENS --	1	-- BRIAN STEVENS --
2	Diane Greene regarding Ms. Rowe's role?	2	Ms. Rowe's level would be?
3	A. Not that I recall.	3	MR. GAGE: Objection.
4	Q. Did you have any conversations with	4	A. Yeah, that's a broad question. I was
5	Diane Greene regarding Ms. Rowe's trajectory at	5	targeting -- you know, we were targeting Level 8
6	the company?	6	hires in the CTO office, so not directly.
7	A. Not that I recall.	7	Q. Were some individuals brought in as
8	Q. Did you have any conversations with	8	Level 9?
9	Diane Greene regarding Ms. Rowe's performance?	9	A. Yes.
10	A. No, not that I recall.	10	Q. Were you involved in the decision to
11	Q. Did you have any conversations with	11	bring individuals in at a Level 9?
12	Diane Greene regarding Ms. Rowe's compensation?	12	A. Indirectly.
13	A. No, not that I recall.	13	Q. In what way were you indirectly
14	Q. Did you have any conversations with	14	involved?
15	anyone regarding Ms. Rowe's role at the company?	15	A. As the manager of Will.
16	MR. GAGE: Objection.	16	Q. And how did that indirect involvement
17	A. Her current role? I don't think I	17	relate to hiring people as Level 9?
18	understand that question.	18	A. Typically I'd be the approver, the
19	Q. When you were there, did you have any	19	final approver.
20	conversations with anyone regarding Ms. Rowe and	20	Q. And so would Mr. Grannis make the
21	her role at the company, her job at the company?	21	recommendation with respect to what level someone
22	MR. GAGE: Objection.	22	should be brought in?
23	A. Possibly.	23	MR. GAGE: Objection.
24	Q. Any that you recall with	24	A. Not independently.
25	particularity?	25	Q. What's your understanding of how the

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<p style="text-align: right;">Page 62</p> <p>1 -- BRIAN STEVENS --</p> <p>2 recommendation for what level someone should be</p> <p>3 brought in was determined?</p> <p>4 A. By following a Google process for</p> <p>5 calibration -- calibrating employees.</p> <p>6 Q. And what's your understanding of what</p> <p>7 that Google process for calibration entails?</p> <p>8 A. It entails many -- analyzing the</p> <p>9 results of many interviews, and job experience</p> <p>10 against a job description.</p> <p>11 Q. At the time that first wave was</p> <p>12 hired, do you know whether there was a ladder for</p> <p>13 the technical directors?</p> <p>14 A. There was. You always need to hire</p> <p>15 against a ladder, yes.</p> <p>16 Q. At the time you approved the</p> <p>17 recommendations for level of hire, did you inquire</p> <p>18 as to whether the calibration process had been</p> <p>19 followed?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. The -- I didn't audit the process, if</p> <p>22 that's what you're asking.</p> <p>23 Q. I'm asking if you said, hey, did you</p> <p>24 follow the process, or anything like that?</p> <p>25 A. HR guides the -- HR guides the</p>	<p style="text-align: right;">Page 64</p> <p>1 -- BRIAN STEVENS --</p> <p>2 A. The creation of a centralized team</p> <p>3 focused on verticals.</p> <p>4 Q. Actually, I want you to look at</p> <p>5 another document. Well, actually we'll wait</p> <p>6 because you're not a recipient on this one, so I'm</p> <p>7 going to ask you a few questions first.</p> <p>8 At some point in time while Ms. Rowe</p> <p>9 was still in the office of the CTO, was there a</p> <p>10 discussion about reorganizing Mr. Grannis' direct</p> <p>11 reports?</p> <p>12 A. Not that I'm aware of.</p> <p>13 Q. Do you recall a discussion about</p> <p>14 creating a verticals group under Mr. Grannis?</p> <p>15 A. No, I don't recall that.</p> <p>16 Q. Do you recall any discussion about</p> <p>17 Ms. Rowe leading a verticals group under</p> <p>18 Mr. Grannis?</p> <p>19 A. No, I don't recall that.</p> <p>20 Q. That wasn't something that</p> <p>21 Mr. Grannis discussed with you?</p> <p>22 MR. GAGE: Objection.</p> <p>23 A. Not that I recall. Will discusses</p> <p>24 many things.</p> <p>25 Q. Okay. And so again if you can just</p>
<p style="text-align: right;">Page 63</p> <p>1 -- BRIAN STEVENS --</p> <p>2 process.</p> <p>3 Q. So by the time it comes to you, you</p> <p>4 assume the process had been followed?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Typically, yes.</p> <p>7 Q. Did you -- do you recall whether you</p> <p>8 asked for any documentation supporting the level</p> <p>9 recommendation?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Yeah, not that I recall.</p> <p>12 Q. Do you recall asking what factors</p> <p>13 were supporting a hire as a Level 9 as opposed to</p> <p>14 a Level 8?</p> <p>15 A. No, I don't recall.</p> <p>16 MR. GAGE: Objection.</p> <p>17 Q. Do you know factors Mr. Grannis and</p> <p>18 HR considered with respect to the levelling?</p> <p>19 MR. GAGE: Objection.</p> <p>20 A. I do not recall the details of the --</p> <p>21 of the levelling attributes.</p> <p>22 Q. At some point in time was Ms. Rowe</p> <p>23 moved out of OCTO?</p> <p>24 A. Yes, she was.</p> <p>25 Q. And how did that come about?</p>	<p style="text-align: right;">Page 65</p> <p>1 -- BRIAN STEVENS --</p> <p>2 repeat your answer for how it came to be that</p> <p>3 Ms. Rowe was moved out of OCTO.</p> <p>4 A. Diane Greene reassigned Tariq</p> <p>5 Shaukat, and one of his responsibilities was to</p> <p>6 lead a central verticals function.</p> <p>7 Q. Can you tell me what you mean by</p> <p>8 "central verticals function"?</p> <p>9 A. Central verticals function meaning</p> <p>10 lead industry teams focused on certain industry</p> <p>11 sectors.</p> <p>12 Q. And so how did that relate to</p> <p>13 Ms. Rowe being moved out of OCTO?</p> <p>14 A. There was recognized that people</p> <p>15 within OCTO had domain expertise within key</p> <p>16 verticals and were expected to move into a</p> <p>17 centralized role, centralized group.</p> <p>18 Q. And who were those individuals who</p> <p>19 were recognized as having domain expertise?</p> <p>20 A. From recollection, Ulku, Evren, Ben</p> <p>21 and Jeff Kemper.</p> <p>22 Q. And what was the domain expertise</p> <p>23 that Ulku was recognized as having?</p> <p>24 A. For financial services.</p> <p>25 Q. And was that expertise recognized --</p>